Wilmington Woburn Intermodal LLC
133 Pearl Street
Boston, MA 02110

October 26, 2020

By email: morash.melania@epa.gov

Melanie Morash
EPA Region 1 New England
5 Post Office Square, Suite 100
Mail Code: SEMD 07-04
Boston, MA 02109-3912

Re: Comments on Proposed Plan for Interim and Permanent Remedies at the Olin Superfund Site, Wilmington, Massachusetts (Site)

Dear Ms. Morash:

As you know, Wilmington Woburn Intermodal LLC (WWI), an affiliate of GFI Partners (GFI), is under contract to purchase the Site from Olin. WWI and GFI remain very interested in developing the Site as a warehouse facility. The Site's location, proximity to rail, existing zoning and size are the reasons that GFI continues to believe in the value of this project and has invested the time to work with Olin and EPA on its redevelopment. Our comments are intended to ensure that the implementation of the Proposed Plan, once finalized, does not preclude or extensively delay our intended development of this site.

Containment Area Cap

The Proposed Plan includes both an interim cleanup action to address "major sources of contamination in groundwater," and a final cleanup action to "address contamination in soil, sediments, and surface water." The "major sources of contamination in groundwater" are the Dense Aqueous Phase Liquid (DAPL), found both on-site and off-site in DAPL pools, and pockets of highly contaminated groundwater. In describing that the effort to remediate the DAPL pools and highly contaminated groundwater is an "interim cleanup action," EPA explains that under the Proposed Plan it is also requiring that additional investigations be performed to close remaining data gaps, including

> an improved characterization of bedrock topography and further delineation of the horizontal and vertical extent of groundwater contamination and the DAPL pools. The results of these efforts will be used to evaluate long term groundwater cleanup options, leading to the selection of a final groundwater cleanup plan for the Olin Site.

Proposed Plan, Page 34 (emphasis added).

One of the DAPL pools is located on the Site in the location of the "Containment Area." The Proposed Plan also calls for this portion of the Site to be covered with a permanent, impermeable cap. This approach raises several questions and concerns:

- How does the fact that additional sampling is anticipated affect the proposed permanent, impermeable cap? Does EPA anticipate that the additional investigation and, potentially

remediation, will affect the design and installation of the permanent cap over the Containment Area? Is the cap to be installed only after the data gap analysis is performed? Or does EPA anticipate that no further DAPL removal (beyond that described in the Proposed Plan) will be required in the containment area?

- The anticipated removal of the DAPL and highly contaminated groundwater is expected to take 8 years. Does EPA anticipate that the permanent, impermeable cap is installed after the DAPL removal? Or can the DAPL removal proceed with the permanent cap in place?

- The Proposed Plan notes that the impermeable cap over the containment area is yet to be designed. Since the cap must be impermeable, would EPA consider a building, properly designed to address potential vapor intrusion, as a component of that impermeable cap. If a building is not designed as part of the cap, could the cap be designed and constructed to allow for a building to be constructed in the future? It is our understanding that this has occurred at other NPL sites, such as the Raymark site in Stratford. We would be happy to work directly with Olin on the specifics of the integration of a building into such a cap design but would ask that EPA clarify that such an approach would be acceptable under the Proposed Plan.

<u>On-Site Soil Cover</u>

The final cleanup action for the on-Site soil also includes some soil excavation and capping with either asphalt or soil cover. It appears that the selection of asphalt or soil is to be consistent with existing conditions, i.e., replace asphalt with asphalt, and soil with soil. The purpose of the asphalt and soil cap it to prevent human contact with contaminated soil. As you know from our prior discussions, our proposed development involves the construction of a large warehouse building. Would EPA be amendable to a "cap" that consisted of a building, in lieu of asphalt or soil? As noted above, we would be happy to work directly with Olin on the design of the remedial approach to the on-Site soils, but would ask that EPA clarify that a building would be acceptable as a cap over these soils under the Proposed Plan.

<u>On-Site Treatment of Groundwater and NAPL</u>

The Proposed Plan also includes the collection and onsite (on the Olin Site) treatment of highly contaminated groundwater from off-site and of LNAPL. The Plan includes demolishing Plant B (current treatment building) and constructing a new treatment building. The figures attached to the Proposed Plan show the new treatment building located near the to-be-demolished Plant B, and piping running through the Site to transport highly contaminated groundwater to that treatment building.

For several reasons, we would suggest that EPA consider locating the treatment building for the off-site highly contaminated groundwater off the Site. At a minimum, we would suggest that EPA confirm in the final Plan that the location of the treatment building is not fixed and that the final configuration of the piping and building will be determined during the Remedial Design/Remedial Action phase. We note that during the public information meeting, EPA stated that the location of the new treatment building is not finalized, and is subject to the

completion of the remedial design portion of the cleanup action; it would be helpful if this were clarified in writing in the Final Plan.

- Utilizing one on-site treatment building for the off-site highly contaminated groundwater requires the installation of piping through much of the developable area of the Site. This phase of the Proposed Plan is anticipated to continue for at least 8 years and could be longer depending upon the results of the data gap analysis. The presence of this piping as shown on the figures attached to the Proposed Plan will unnecessarily complicate any future redevelopment of the Olin Site, and will make new construction difficult. Any new construction will need to accommodate access to the piping.
- Piping the highly contaminated groundwater all the way to the former location of Plant B increases the distance these contaminants are piped and will involve crossing at least one wetland. The longer the piping, the more opportunity for a release.

Another affiliate of GFI Partners recently acquired the property located at 1 Jewel Drive. This groundwater below this location is also highly impacted and DAPL is present below this property. GFI would be willing to work with Olin and EPA to locate the treatment system for the highly contaminated groundwater on this property. Utilizing this parcel would eliminate the wetlands crossing for the piping. It would also eliminate much of the piping throughout the Olin Site, facilitating its future redevelopment. In addition, use of the Jewel Drive property for the treatment system may alleviate concerns over relocation of water from the Ipswich River watershed to the Aberjona River watershed.

Given that the LNAPL is located on the Site, treatment of the LNAPL in the location of Plant B would not require extensive piping throughout the Site and would not have an adverse impact on its development.

WWI/GFI remain committed to the redevelopment of the Site. We would ask that EPA consider these comments when it finalizes the Proposed Plan; we believe that our suggestions will facilitate redevelopment and productive reuse of the Site.

Please contact me with any questions.

Sincerely,

Brian A. Poitras
Authorized Representative
cc: Olin Corp.